

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :
 :
 : Criminal Case No.
 v. :
 : In violation of 18 U.S.C. § 1594(c);
 REGINALD CHANEY, : 18 U.S.C. § 1591 (a)(1), (a)(2), (b)(1),
 a/k/a "Reggie" : (b)(2), (c); 18 U.S.C. §2423(a), (e); and 18
 Defendant : U.S.C. § 2

CR 15 38 M
INDICTMENT

The Grand Jury charges that:


COUNT 1

Conspiracy to Commit Sex Trafficking a Child


From on or about January 18, 2015, exact date unknown, through on or about January 30, 2015, in the District of Rhode Island, the defendant, REGINALD CHANEY, a/k/a "Reggie," and others, known and unknown to the Grand Jury, did knowingly, intentionally, and willfully combine, conspire, confederate and agree with each other and with other persons to:

- A) recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, namely VICTIM-1, a female whose identity is known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, as defined in Title 18, United States

Code, Section 1591(e)(2), or any combination of such means, will be used to cause VICTIM-1 to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), and (b)(1);

- B) recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, namely VICTIM-1, a female whose identity is known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe, that VICTIM-1 had not attained the age of 18 years and would be caused to engage in a commercial sex act,  , all in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(2) and (c);

- C) recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, namely VICTIM-2, a female whose identity is known to the Grand Jury, and did benefit financially and be receiving anything of value from participation in a venture engaged in such acts knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, as defined in Title 18, United States Code, Section 1591(e)(2), or any combination of such means, will be used to cause VICTIM-2 to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), and (c);

D) recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, namely VICTIM-2, a female whose identity is known to the Grand Jury, and did benefit financially and be receiving anything of value from participation in a venture engaged in such acts knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe, that VICTIM-2 had not attained the age of 18 years and would be caused to engage in commercial sex act,  , all in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(2) and (c);

All in violation of 18 U.S.C. §1594(c).

COUNT 2
Sex Trafficking of a Child

Between on or about January 18, 2015, and on or about January 28, 2015 in the District of Rhode Island and elsewhere, the defendant, REGINALD CHANEY, a/k/ a "Reggie," did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, namely VICTIM-1, a female whose identity is known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, as defined in Title 18, United States Code, Section 1591(e)(2), or any combination of such means, will be used to cause VICTIM-1 to engage in a commercial

sex act, and knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe, that VICTIM-1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and aided and abetted the same, all in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c); 18 U.S.C. § 2; and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 3
Sex Trafficking of a Child

Between on or about January 18, 2015, and on or about January 30, 2015 in the District of Rhode Island and elsewhere, the defendant, REGINALD CHANEY, a/k/a "Reggie," did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, namely VICTIM-2, a female whose identity is known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, as defined in Title 18, United States Code, Section 1591(e)(2), or any combination of such means, will be used to cause VICTIM-2 to engage in a commercial sex act, and knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe, that VICTIM-2 had not attained the age of 18 years and would be caused to engage in commercial sex act, and aided and abetted the same, all in violation of 18 U.S.C. §§

1591(a)(1), (a)(2), (b)(1), (b)(2) and (c); 18 U.S.C. § 2; and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 4
Conspiracy to Commit Transportation of a Minor

From on or about January 18, 2015, exact date unknown, through on or about January 30, 2015, in the District of Rhode Island, the defendant, REGINALD CHANEY, a/k/ a "Reggie," and others, known and unknown to the Grand Jury, did knowingly, intentionally, and willfully combine, conspire, confederate and agree with each other and with other persons to:

- A) knowingly transport an individual, VICTIM-1, who had not attained the age of 18 years in interstate and foreign commerce, with the intent that the individual engage in prostitution or sexual activity for which a person can be charged with a criminal offense, in violation of 18 U.S.C. §2423(a); and
- B) knowingly transport an individual, VICTIM-2, who had not attained the age of 18 years in interstate and foreign commerce, with the intent that the individual engage in prostitution or sexual activity for which a person can be charged with a criminal offense, in violation of 18 U.S.C. §2423(a).

All in violation of 18 U.S.C. §2423(e).

COUNT 5
Transportation of a Minor

Between on or about January 18, 2015, and on or about January 28, 2015, in the District of Rhode Island and elsewhere, the defendant, REGINALD CHANEY, a/k/a REGGIE, did knowingly transport an individual, VICTIM-1, who had not attained the age of 18 years in interstate and foreign commerce, with the intent that the individual engage in prostitution or sexual activity for which a person can be charged with a criminal offense, in violation of 18 U.S.C. §2423(a), 18 U.S.C. § 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT 6
Transportation of a Minor

Between on or about January 18, 2015, and on or about January 30, 2015, in the District of Rhode Island and elsewhere, the defendant, REGINALD CHANEY, a/k/a REGGIE, did knowingly transport an individual, VICTIM-2, who had not attained the age of 18 years in interstate and foreign commerce, with the intent that the individual engage in prostitution or sexual activity for which a person can be charged with a criminal offense, in violation of 18 U.S.C. §2423(a), 18 U.S.C. § 2, and Pinkerton v. United States, 328 U.S. 640 (1946).


PETER F. NERONHA,
United States Attorney

A TRUE BILL:

REDACTED



PAMELA E. CHIN
Assistant United States Attorney



STEPHEN G. DAMBRUCH
First Assistant U.S. Attorney

Date: 4.22.2015

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. _____

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

 UNITED STATES DISTRICT COURT RHODE ISLAND
 DISTRICT OF RHODE ISLAND Divisional Office

 Name and Office of Person
 Furnishing Information on
 THIS FORM PETER F. NERONHA
☒ U.S. Atty ☐ Other U.S. Agency
 Phone No. _____

 Name of Asst.
 U.S. Attorney PAMELA CHIN
 (if assigned)

PROCEEDING

 Name of Complainant Agency, or Person (& Title, if any)
Homeland Security Investigations
☐ person is awaiting trial in another Federal or State Court
 (give name of court)

☐ this person/proceeding transferred from another district
 per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges
 previously dismissed which were
 dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a
 pending case involving this same
 defendant. (Notice of Related
 Case must still be filed with the
 Clerk.)
SHOW
DOCKET NO.
☒ prior proceedings or appearance(s)
 before U.S. Magistrate Judge
 regarding this defendant were
 recorded under

 MAG. JUDGE
 CASE NO.
1:15-MJ-059 LDA
Place of offense RHODE ISLAND

County

USA vs.

Defendant: REGINALD CHANEY a/k/a "Reggie"

Ad:

REDACTEDBi
D:1
able)

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Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date 3/25/2015 or Date Transferred to Federal Custody _____☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☒ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 6

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	SEE ATTACHMENT		<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 6	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Attachment to
Defendant Information Relative to a Criminal Action – In U.S. District Court

Defendant: REGINALD CHANEY a/k/a “Reggie”

Count I: Conspiracy to commit sex trafficking a child, in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), and (c).

Max Penalties: 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), and (c) – Life imprisonment with a mandatory minimum of 15 years; \$250,000 fine; 5 years supervised release; \$100 mandatory special assessment.

Count II: Sex trafficking of a child, in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c); 18 U.S.C. § 2; and Pinkerton v. United States, 328 U.S. 640 (1946).

Max Penalties: 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c); 18 U.S.C. § 2; and Pinkerton v. United States, 328 U.S. 640 (1946) – Life imprisonment with a mandatory minimum term of 15 years; \$250,000 fine; 5 years supervised release; \$100 mandatory special assessment.

Count III: Sex trafficking of a child, in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c); 18 U.S.C. § 2; and Pinkerton v. United States, 328 U.S. 640 (1946).

Max Penalties: 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c); 18 U.S.C. § 2; and Pinkerton v. United States, 328 U.S. 640 (1946) – Life imprisonment with a mandatory minimum term of 15 years; \$250,000 fine; 5 years supervised release; \$100 mandatory special assessment.

Count IV: Conspiracy to commit transportation of a minor, in violation of 18 U.S.C. §2423(a).

Max Penalties: 18 U.S.C. §2423(a) –Life imprisonment with a mandatory minimum term of 10 years; \$250,000 fine; 5 years supervised release; \$100 mandatory special assessment.

Count V: Transportation of a minor, in violation of 18 U.S.C. §2423(a), 18 U.S.C. §2 and Pinkerton v. United States, 328 U.S. 640 (1946).

Max Penalties: 18 U.S.C. §2423(a), 18 U.S.C. §2 and Pinkerton v. United States, 328 U.S. 640 (1946) – Life imprisonment with a mandatory minimum term of 10 years; \$250,000 fine; 5 years supervised release; \$100 mandatory special assessment.

Count VI: Transportation of a minor, in violation of 18 U.S.C. §2423(a), 18 U.S.C. §2 and Pinkerton v. United States, 328 U.S. 640 (1946).

Max Penalties: 18 U.S.C. §2423(a), 18 U.S.C. §2 and Pinkerton v. United States, 328 U.S. 640 (1946) – Life imprisonment with a mandatory minimum term of 10 years; \$250,000 fine; 5 years supervised release; \$100 mandatory special assessment.